

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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NORMAN ORENTREICH, M.D.,

Plaintiff,

v.

WAYNE RICHARD,

Defendant.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action No.: 04-11349-RGS

**JOINT MOTION FOR 30-DAY EXTENSION OF DEADLINES TO
COMPLETE DISCOVERY AND FILE DISPOSITIVE MOTIONS**

Plaintiff Norman Orentreich, M.D. ("Plaintiff") and Defendant Wayne Richard ("Defendant") (collectively "the Parties"), by their undersigned counsel, hereby move this Honorable Court to continue for 30 days certain deadlines set in this case. In support of this Motion, the Parties state as follows:

1. At the Rule 16.1 conference ("Conference"), this Court set the following deadlines:

- a. Discovery to be complete – December 31, 2004; and
- b. Dispositive motions - February 1, 2005, with responses due 14 days thereafter.

2. On January 5, 2005, the Court granted the parties' first Joint Motion to extend deadlines to complete discovery. On January 28, 2005, the Court granted the parties second Joint Motion to extend deadlines to complete discovery.

3. The Court has not set a trial date.

4. In the present case, both Parties have noticed the deposition of the other, and Plaintiff propounded a request for production of documents to Defendant. The Parties will not propound

any additional discovery or notice any additional depositions during the next 30 days if this motion is allowed by the Court.

5. The Parties request this brief extension to accommodate ongoing settlement discussions.


6. The parties propose the following new deadlines:

- a. Discovery to be complete – April 4, 2005
- b. Dispositive motions – May 4, 2005, with responses due 14 days thereafter


WHEREFORE, Plaintiff Norman Orentreich, M.D. and Defendant Wayne Richard pray that their Joint Motion be allowed.

Counsel for Norman Orentreich, M.D.,

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Dated: March 1, 2005

CERTIFICATE OF SERVICE
I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail/hand on 3-1-05
